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6 Attorneys for Defendants  
7 ONE TOUCH DIRECT, LLC, and  
ONETOUCH DIRECT- SAN ANTONIO LLC  
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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA

11 ROBERT ROSS,

12 Plaintiff,

13 vs.

14 AT&T MOBILITY, LLC, ONE TOUCH  
DIRECT, LLC, and ONE TOUCH DIRECT-  
15 SAN ANTONIO, LLC,

16 Defendant.  
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Case No. 4:19-cv-6669-JST

**JOINT STIPULATION AND REQUEST  
TO ADD ONE TOUCH DIRECT, LLC  
AND ONETOUCH DIRECT – SAN  
ANTONIO LLC TO THE PROTECTIVE  
ORDER; AND [PROPOSED] ORDER**

1 Plaintiff, Robert Ross (“Plaintiff”), and Defendants AT&T Mobility, LLC (“AT&T”),  
 2 One Touch Direct, LLC (“OTD”), and OneTouch Direct – San Antonio LLC (“OTD-SA”)  
 3 (collectively, OTD and OTD-SA are the “OTD Defendants”), through their counsel of record,  
 4 hereby stipulate and respectfully request that the OTD Defendants, as later joined parties, be  
 5 added as parties to the Protective Order in this case. The Plaintiff, AT&T and the OTD  
 6 Defendants are collectively referred to herein as the “Parties.”

7 IT IS HEREBY STIPULATED by and between the Parties as follows:

8 1. On June 25, 2020, the Court issued Plaintiff and AT&T’s stipulated Protective  
 9 Order (as modified by the Court) (“Protective Order”) (Dkt. No. 57), which governs the  
 10 confidentiality of documents in this action.

11 2. On December 21, 2020, Plaintiff filed its First Amended Complaint naming the  
 12 OTD Defendants as defendants for the first time. (Dkt. No. 71.)

13 3. On January 29, 2021, the OTD Defendants filed their Answer to the First  
 14 Amended Complaint.

15 4. As later joined parties, the OTD Defendants have agreed to abide by the terms of  
 16 the Protective Order and to be added as “Parties” to the Protective Order.

17 5. Good cause exists to add the OTD Defendants as Parties to the Protective Order to  
 18 ensure the protections provided under the Protective Order extend to the OTD Defendants as  
 19 newly joined parties to the action.

20 6. The Parties hereby respectfully request that the OTD Defendants be deemed added  
 21 as Parties to the Protective Order.

22 IT IS SO STIPULATED.

23 DATED: March 16, 2021

BUCHALTER, A Professional Corporation

24  
 25 By: /s/ Alissa R. Pleau-Fuller  
 26 KEVIN T. COLLINS  
 27 ALISSA R. PLEAU-FULLER  
 28 Attorneys for Defendants  
 ONE TOUCH DIRECT, LLC, and ONE  
 TOUCH DIRECT- SAN ANTONIO, LLC

1 DATED: March 16, 2021

AFFELD GRIVAKES LLP

2  
3 By: /s/ Christopher Grivakes  
4 CHRISTOPHER GRIVAKES  
5 DAMION ROBINSON  
6 Attorneys for Plaintiff  
7 ROBERT ROSS

8 DATED: March 16, 2021

GIBSON, DUNN & CRUTCHER LLP

9 By: /s/ Ashley Johnson  
10 MARCELLUS MCRAE  
11 ASHLEY JOHNSON  
12 Attorneys for Defendant  
13 AT&T Mobility, LLC

14 I, the undersigned, hereby attest that the other signatories have concurred in the filing of  
15 this document as indicated by a conformed signature (/s/) within this e-filed document.

16 DATED: March 16, 2021

BUCHALTER, A Professional Corporation

17 By: /s/ Alissa R. Pleau-Fuller  
18 KEVIN T. COLLINS  
19 ALISSA R. PLEAU-FULLER  
20 Attorneys for Defendants  
21 ONE TOUCH DIRECT, LLC, and ONETOUCH  
22 DIRECT- SAN ANTONIO LLC  
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**[PROPOSED] ORDER**

Having read and considered the moving papers, the Parties' Joint Stipulation and Request to Add One Touch Direct, LLC and OneTouch Direct – San Antonio LLC (collectively, "OTD Defendants") to the Protective Order in this case (Dkt. No. 57) is hereby GRANTED. The OTD Defendants are hereby added as Parties to the Protective Order.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

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HON. JON S. TIGAR  
United States District Court Judge